

OMB No. 1124-0003; Expires May 31, 2020

U.S. Department of Justice

Washington, DC 20530

## Amendment to Registration Statement Pursuant to the Foreign Agents Registration Act of 1938, as amended

INSTRUCTIONS. File this amendment form for any changes to a registration. Compliance is accomplished by filing an electronic amendment to registration statement and uploading any supporting documents at <https://www.fara.gov>.

Privacy Act Statement. The filing of this document is required for the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, for the purposes of registration under the Act and public disclosure. Provision of the information requested is mandatory, and failure to provide the information is subject to the penalty and enforcement provisions established in Section 8 of the Act. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, copy of informational materials or other document or information filed with the Attorney General under this Act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, DC. Statements are also available online at the Registration Unit's webpage: <https://www.fara.gov>. One copy of every such document, other than informational materials, is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of any and all documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. The Attorney General also transmits a semi-annual report to Congress on the administration of the Act which lists the names of all agents registered under the Act and the foreign principals they represent. This report is available to the public in print and online at: <https://www.fara.gov>.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Counterintelligence and Export Control Section, National Security Division, U.S. Department of Justice, Washington, DC 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, DC 20503.

1. Name of Registrant  Law Office of David B. Kultgen, PLLC	2. Registration No.  6527
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3. This amendment is filed to accomplish the following indicated purpose or purposes:

- ☒ To give a 10-day notice of change in information as required by Section 2(b) of the Act.
- ☐ To correct a deficiency in
- ☐ Initial Statement
- ☐ Supplemental Statement for the period ending \_\_\_\_\_
- ☐ Other purpose (*specify*) \_\_\_\_\_
- ☒ To give notice of change in an exhibit previously filed.

4. If this amendment requires the filing of a document or documents, please list:

Engagement Letter for legal services with the King Abdullah City for Atomic and Renewable Energy (K.A.CARE), executed by K.A.CARE and effective on September 4, 2019

5. Each item checked above must be explained below in full detail together with, where appropriate, specific reference to and identity of the item in the registration statement to which it pertains. (*If space is insufficient, a full insert page must be used.*)

To (1) reflect the change of name of the existing foreign principal from the Ministry of Energy, Industry and Mineral Resources of the Kingdom of Saudi Arabia to "Ministry of Energy of the Kingdom of Saudi Arabia" and (2) add K.A.CARE as an additional Foreign Principal following execution of the agreement described in 4, above.

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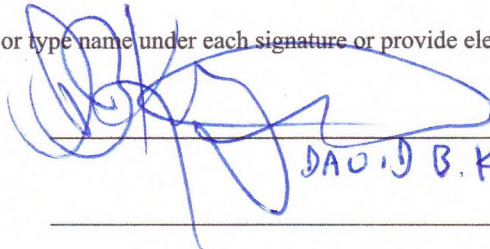
**EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to the truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

9.11.19

(Print or type name under each signature or provide electronic signature<sup>1</sup>)

  
DAVID B. KULTGEN

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<sup>1</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.



## **The Law Office of David B. Kultgen**

A Professional Limited Liability Company

### **STRICTLY CONFIDENTIAL**

March 2, 2019

H.E. Khaled S. Al Sultan  
President  
King Abdullah City for Atomic and Renewable Energy  
RIYADH

Your Excellency,

K.A.CARE has asked that the Law Office of David B. Kultgen, PLLC (the "FIRM") provide legal assistance to King Abdullah City for Atomic and Renewable Energy ("K.A.CARE") with respect to K.A.CARE's management of the Saudi National Atomic Energy Project ("SNAEP"). We would be delighted to do so, based on the following conditions and understandings:

1. The FIRM will advise you in connection with an agreement with the United States Government under Section 123 of the Atomic Energy Act of 1954 ("123 Agreement") and related agreements, as well as Congressional review of the 123 Agreement. We will also advise you regarding U.S. laws and regulations concerning export controls and non-proliferation of civilian nuclear materials, and other matters upon request.
2. The FIRM will work closely with External Legal Counsel (currently King & Spalding LLP and Pillsbury Winthrop Shaw Pittman LLP) jointly engaged by K.A.CARE and the Ministry of Energy, Industry and Mineral Resources ("MEIM") to support SNAEP.
3. The scope of the initial engagement may be extended by mutual agreement, confirmed by an email from both parties, to include legal advice and support with respect to implementation of the Large Nuclear Power Plant Project and/or other aspects of SNAEP.
4. As you are aware, the FIRM currently provides legal assistance to the MEIM with respect to its role in SNAEP. Going forward, our joint clients will be both K.A.CARE and MEIM.

David B. Kultgen  
11841 Overlook Pass  
Austin, Texas 77038

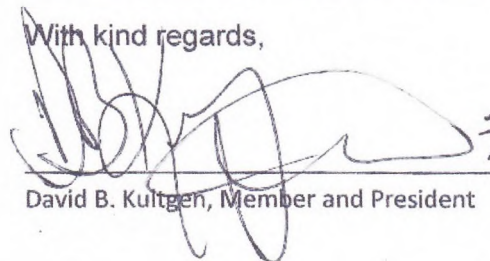
+1 (512) 582-0853 (o)  
+1 (512) 586-4692 (m)  
david.kultgen@kultgenlaw.net

5. Our work for MEIM with respect to SNAEP is subject to the terms of a general Legal Services Agreement between the FIRM and MEIM dated March 21, 2018 (the "MEIM Agreement"), which encompasses legal and consulting services for MEIM in connection with SNAEP, as well as other projects and matters referred to the FIRM by MEIM from time to time.
6. Our work for K.A.CARE will be subject to the terms of the MEIM Agreement. Invoices for services provided to K.A.CARE will be submitted to MEIM and the FIRM will be compensated by MEIM.

If these terms are acceptable, please confirm K.A.CARE's agreement by signing in the space indicated below.

We thank you for this opportunity to be of service.

With kind regards,



3/2/19

David B. Kultgen, Member and President

**Agreed:**

**King Abdullah City for Atomic and  
Renewable Energy**

By: 

Title: Head of Legal Department

Date: 9/5/2019



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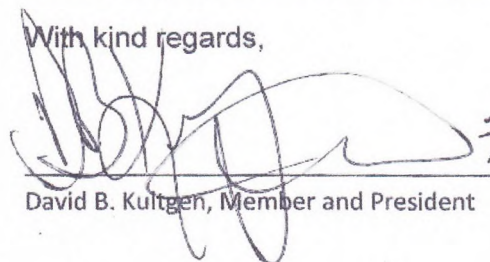
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By: 

Title: Head of Legal Department

Date: 9/5/2019